

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of:

THE COMMONWEALTH OF PUERTO
RICO, THE EMPLOYEE'S RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,
AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY

Debtors

PROMESA

Title III

Case No. 17-bk-3283 (LTS)

(Jointly Administered)¹

**JOINDER OF FINCA MATILDE, INC. TO "SUR REPLY TO DEBTOR'S
OMNIBUS REPLY (DOCKET #18874)" FILED BY PFZ PROPERTIES, INC.**

TO THE HONORABLE COURT:

COMES NOW **Finca Matilde, Inc.** ("Finca Matilde"), a creditor in the captioned case, whom, through the undersigned legal counsel, very respectfully state, pray, and submits the instant sur-reply to *Omnibus Reply of the Commonwealth of Puerto Rico, The Employees Retirement System of the Government of Puerto Rico, and The Puerto Rico Public Buildings Authority to Objections to Seventh Amended Tittle III Joint Plan of Adjustment* (the "Reply") filed and proposed by the Financial Oversight and

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 35(787)66-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

Management Board for Puerto Rico (“Oversight Board”) at Docket No. 18874, as authorized through a bench order by this Court at the hearing held on November 1, 2021.

1. Finca Matilde is the holder of a claim against the against the Commonwealth of Puerto Rico (the “Commonwealth”) for just compensation. The currently filed plan seeks to impair, discharge, and release the Commonwealth’s obligation to pay just compensation. Thus, Finca Matilde objected and moved for denial of confirmation arguing that eminent domain claims can neither be impaired nor discharged in bankruptcy.

2. At the hearing held on November 1, 2021, this Honorable Court granted Finca Matilde and other similarly situated creditors, like PFZ Properties, Inc., leave to file a sur-reply to the Board’s Reply. PFZ Properties, Inc. Filed its sur-reply today, at Docket No. 19088. Finca Matilde files this Joinder to the PFZ’s sur-reply and adopts the legal arguments set forth therein.

WHEREFORE, Finca Matilde requests that this Honorable Court grant this joinder and request for relief filed by PFZ at Docket No. 18874.

I HEREBY CERTIFY, that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which will send electronic notification to all participants.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 5th day of November of 2021.

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